

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)
ALEXANDER E. JONES) Chapter 11
Debtor.)
) Case No. 22-33553 (CML)
)
)
)

**FIFTH STIPULATION AND AGREED ORDER GRANTING THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF ALEXANDER E. JONES AN
EXTENSION OF TIME TO OBJECT TO A CLAIM OF EXEMPTIONS
AND OTHER RELATED RELIEF**

Alexander E. Jones (“Jones” or the “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 case (the “Chapter 11 Case”), by and through their respective undersigned counsel, hereby enter into this fifth stipulation and agreed order (the “Fifth Stipulation and Order”) as follows:

WHEREAS, the Debtor filed his Schedules of Assets and Liabilities on February 14, 2023 [ECF No. 161] (the “First Schedules”);

WHEREAS, the Debtor filed his amended Schedules of Assets and Liabilities on March 30, 2023 [ECF No. 231] (the “Amended Schedules”);

WHEREAS, the Debtor filed his second amended Schedules of Assets and Liabilities on April 18, 2023 [ECF No. 242] (the “Second Amended Schedules”);

WHEREAS, the Debtor previously identified at least one additional modification to be made to the Schedule C of the Second Amended Schedules, and informed the Committee that it could file further amended Schedules in the future;

WHEREAS, in order to preserve resources of the estate, on May 17, 2023, counsel for the Committee and counsel for the Debtor entered into a stipulation and agreed order to extend the

deadline for any challenge to Schedule C of the Second Amended Schedules to until and at least June 19, 2023, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court, which was so ordered by the Court on May 18, 2023 [ECF No. 285] (the “First Stipulation and Order”);

WHEREAS, in order to preserve resources of the estate, on June 16, 2023, counsel for the Committee and counsel for the Debtor entered into a second stipulation and agreed order to extend the deadline for any challenge to Schedule C of the Second Amended Schedules to until and at least August 18, 2023, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court, which was so ordered by the Court on June 16, 2023 [ECF No. 333] (the “Second Stipulation and Order”);

WHEREAS, in order to preserve resources of the estate, on August 18, 2023, counsel for the Committee and counsel for the Debtor entered into a third stipulation and agreed order to extend the deadline for any challenge to Schedule C of the Second Amended Schedules to until and at least October 20, 2023, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court, which was so ordered by the Court on August 18, 2023 [ECF No. 399] (the “Third Stipulation and Order”);

WHEREAS, in order to preserve resources of the estate, on October 18, 2023, counsel for the Committee and counsel for the Debtor entered into a fourth stipulation and agreed order to extend the deadline for any challenge to Schedule C of the Second Amended Schedules to until and at least twenty-one days after the Debtor filed any further amended schedules, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court, which was so ordered by the Court on October 19, 2023 [ECF No. 468] (the “Fourth Stipulation and Order”);

WHEREAS, the Debtor filed further amended schedules on November 26, 2023 (the “Third Amended Schedules”) [ECF No. 501] and has informed the Committee that it may file further amended schedules (the “Further Amended Schedules”);

WHEREAS, the parties entered an *Agreed Scheduling Order for Confirmation Hearing* (the “Confirmation Schedule”) [ECF No. 512] that was ordered by the Court scheduling the dates February 27, 2024–February 29, 2024 for a hearing on a proposed plan of reorganization (as may be extended or modified, the “Confirmation Hearing”);

WHEREAS, in order to preserve resources of the estate and to allow the parties to devote resources to the Confirmation Hearing, counsel for the Committee and counsel for the Debtor have further agreed to extend the deadline for any challenge to Schedule C of the Third Amended Schedules until and at least thirty days after the Confirmation Hearing, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court;

WHEREAS, nothing herein shall be construed as a waiver if the Committee is afforded a lengthier deadline by operation of the filing of any Further Amended Schedules after the Confirmation Hearing;

WHEREAS, good cause exists to extend the deadline to object to the designation of any property currently designated as exempt on Schedule C of the Third Amended Schedules;

**NOW, THEREFORE IN CONSIDERATION OF THE FOREGOING RECITALS,
IT HEREBY IS STIPULATED AND AGREED** as follows:

1. The deadline for the Committee to object to the Debtor’s list of property claimed as exempt in the Debtor’s Schedule C of the Third Amended Schedules shall be extended to thirty days after the conclusion of the Confirmation Hearing.

2. The undersigned hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective parties, and that the respective parties have full knowledge of, and have consented to, this Stipulation.

3. This Stipulation shall be effective immediately upon filing with the Court.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation, and the parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

STIPULATED AND AGREED TO THIS 15TH DAY OF DECEMBER 2023

By: /s/ Vickie L. Driver

Vickie L. Driver

CROWE & DUNLEVY, P.C.

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, Texas 75201

Telephone: 737.218.6187

Facsimile: (214) 969-4343

Email: dallaservice@crowedunlevy.com

Counsel to Alexander E. Jones

By: /s/ Marty L. Brimmage, Jr.

Marty L. Brimmage, Jr.

AKIN GUMP STRAUSS HAUER & FELD LLP

Marty L. Brimmage, Jr.

Texas Bar No. 00793386

Lacy M. Lawrence

Texas Bar No. 24055913

2300 N. Field Street, Suite 1800

Dallas, Texas 75201

Telephone: (214) 969-2800

Facsimile: (214) 969-4343

Email: mbrimmage@akingump.com

Email: llawrence@akingump.com

-and-

Ira S. Dizengoff (admitted *pro hac vice*)
David M. Zensky (admitted *pro hac vice*)
Philip C. Dublin (admitted *pro hac vice*)
Sara L. Brauner (admitted *pro hac vice*)
Katherine Porter (admitted *pro hac vice*)
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002
Email: idizengoff@akingump.com
Email: dzensky@akingump.com
Email: pdublin@akingump.com
Email: sbrauner@akingump.com
Email: kporter@akingump.com

***Counsel to the Official Committee of Unsecured
Creditors of Alexander E. Jones***

SO ORDERED:

Dated: December 15, 2023

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE